## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

KELLY PINN,	<b>§</b>
Plaintiff,	§ § §
<b>v.</b>	§ CASE NO. 1:23-mc-00974
ACTIVEPROSPECT, INC.,	\$ \$ 8
Non-Party/Defendant.	\$ \$ 8
	\$ §

## NON-PARTY ACTIVEPROSPECT, INC.'S UNOPPOSED MOTION FOR LEAVE TO EXCEED PAGE LIMITS

Non-Party ActiveProspect, Inc. ("ActiveProspect") files this unopposed motion requesting leave to exceed the ten-page limit set forth in Local Rule 7(d)(3) with respect to its response to Plaintiff Pinn's Motion to Compel (Dkt. 1). Given the scope of Plaintiff's Motion to Compel, ActiveProspect was unable to comply with the ten-page limit, and its Response therefore exceeds the page limit by three (3) pages. To that end, ActiveProspect respectfully requests the Court grant it leave for three additional pages so that it can adequately respond to all of the issues raised in Plaintiff's Motion to Compel. A copy of ActiveProspect's Response to Plaintiff Pinn's Motion to Compel is attached hereto as **Exhibit A**.

Plaintiff does not oppose this requested relief.<sup>1</sup>

<sup>&</sup>lt;sup>1</sup> Plaintiff Pinn has agreed not to oppose the relief sought in this motion, on the condition that ActiveProspect will not oppose a reciprocal extension on Pinn's reply brief of up to five pages.

Dated: October 2, 2023 Respectfully submitted,

By: /s/ John D. Saba
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## **CERTIFICATE OF CONFERENCE**

Counsel for Non-Party ActiveProspect conferred via email with counsel for Plaintiff on September 29, 2023 regarding this motion. Counsel for Plaintiff is not opposed. Plaintiff Pinn has agreed not to oppose the relief sought in this Motion, on the condition that ActiveProspect will not oppose a reciprocal extension on Pinn's reply brief of up to five pages.

/s/ John D. Saba John D. Saba, Jr.

## **CERTIFICATE OF SERVICE**

I hereby certify that on October 2, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ John D. Saba John D. Saba, Jr.